

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

JILL KILEY, et al.,

Plaintiffs,

vs.

**MEDFIRST CONSULTING
HEALTHCARE STAFFING, LLC.,**

Defendant.

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Civil Action No.:

2:17-cv-01756-RDP

DECLARATION OF RASHANDA RAY

I, Rashanda Ray, do hereby swear, affirm and attest as follows:

1. I am over 18 years of age and competent to testify to the matters stated in this declaration. I make this declaration based upon my personal knowledge.

2. I have worked as an independent contractor for MedFirst since approximately 2011. I work with MedFirst on a project-by-project basis pursuant to a separate Independent Contractor Agreement for each project. While I have occasionally worked on projects for other companies similar to MedFirst, the majority of my projects have been for MedFirst. I have worked on nearly 100 projects for MedFirst over the past six (6) years.

3. The first project I worked on for MedFirst was in Toledo, Ohio. Since then, I have worked all over the country, including in New York, Oregon, and California. I'm currently in Utah, where I have been working on a MedFirst project at Primary Children's Hospital for a little over a year. The longest project I worked on lasted between two (2) and three (3) years. I was in Philadelphia, Pennsylvania for that project. However, I have also worked a MedFirst project where the client only needed me for two (2) days before releasing me from the project. There is a lot of variety from project to project.

4. I have experience with multiple different software systems, including EPIC, Meditech, McKesson, and Cerner. My knowledge of the systems was developed through a combination of information technology courses and on-the-job training using clients' "sandboxes," which allow Consultants to access and train in the client's particular iteration of a software program. Each client implements a customized version of the software system that is designed for their particular needs.

5. Within each software system, there are also different modules tailored to specific units within the healthcare setting – for example, there is an EPIC module specifically

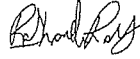
designed for scheduling and intake, and a separate module designed for physicians and nurses to use to document patient care. On top of that, Consultants play various roles on a project. For example, Trainers give presentations providing an overview of how to interact with specific modules of the software in a classroom setting. This requires public speaking and teaching skills. At-the-elbow Consultants provide on-the-job training for healthcare staff, which involves shadowing their daily workflow and answering any questions about how to use the software on the fly. At-the-elbow work requires flexibility and the ability to trouble shoot in real time. You don't know what you don't know until you actually observe how the healthcare professional interacts with the software during their daily tasks. Consultants have varying areas of expertise.

6. If the client needs additional Consultant support in a particular unit, or to fill a specific role, *e.g.*, training or providing at-the-elbow support, they will just grab a Consultant and ask if they can assist. If I am asked to assist in a unit that I am unfamiliar with, or in a role that I am unexperienced in, I generally will find one of my colleagues on the project who has that skillset to refer to the client. The differing skillsets and experience across Consultants staffing a project is what enables us to work effectively as a unified team that can fill any role or solve any problem that may arise for the client. At the end of the day, Consultants are tasked with implementing their variety of skills and backgrounds in order to provide the client with great customer service.

This declaration is given voluntarily. I have not been promised any benefit, coerced, or threatened in any manner in exchange for or in relation to this declaration or the information stated in this declaration.

I declare under penalty of perjury under the laws of the State of Utah and the United States that the foregoing is true and correct.

Dated this 27th day of October, 2017 in Murray, Utah.



Rashanda Ray

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants.

None.

s/ Stacey T. Bradford
OF COUNSEL

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